

June 25, 2012

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Connect America Fund; High-Cost Universal Service Support*,  
Order in WC Docket Nos. 10-90 and 05-337 (DA 12-646, rel. Apr.  
25, 2012); Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Thursday, June 21, John Scanlan, A.G. Scanlan II, and Janet Britton of East Ascension Telephone Company, LLC ("EATEL"), and I met with Michael Steffen of the Chairman's Office to urge FCC action EATEL's application for Commission review and request for stay of the July 1 effective date of the above-captioned Bureau Order.

In the meeting, EATEL described its study area and operations, and the importance to the company of high-cost loop support ("HCLS"). EATEL emphasized its concerns that the Bureau's Order will impede EATEL's ability to raise capital and continue investing in its rural service area. EATEL estimates that the impending loss of \$12.7 million in HCLS as a result of the Order represents about 18.1 percent of EATEL's annual revenues from regulated operations and 17.9 percent of its total annual revenues.

As EATEL explained in its Application for Review, the quantile regression analytical methods adopted in the Order and the inputs employed by the Bureau contain such a significant number of material errors as to render the output unreliable by any objective measure. The inaccuracies in the data and arbitrariness of the calculations will be difficult to correct if the Commission permits the Order to take effect and attempts to adjust the methodology going forward. Accordingly, EATEL respectfully urges the Commission to stay implementation of the Order until proper review of the methodology and inputs for the quantile regression analysis can be analyzed.

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Please direct any questions concerning this matter to me.

Very truly yours,

/s/

Karen Brinkmann  
*Counsel for EATEL*

cc: Michael Steffen